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|--|---|---|--|
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| 7 | Attorneys for Plaintiff | | |
| 8 | UNITED STATES DISTRICT COURT | | |
| 9 | DISTRICT OF NEVADA | | |
| 10 | | I | |
| 11 | DESTINIE MULLEN, an Individual, | Case No.: 2:19-cv-01109-GMN-EJY | |
| 12 | Plaintiff, vs. | | |
| 13 | | STIPULATION AND ORDER TO | |
| $\begin{bmatrix} 13 \\ 14 \end{bmatrix}$ | NUGENT, LLC, a Nevada limited liability company d/b/a GREAT CLIPS, DOES I-X; | EXTEND TIME FOR GREAT CLIPS, INC. TO RESPOND TO SECOND | |
| | and ROE CORPORATIONS I-X, | AMENDED COMPLAINT | |
| 15 | | | |
| 16 | Defendants. | | |
| 17 | | | |
| 18 | Plaintiff DESTINIE MULLEN ("Plaintiff") and Defendant GREAT CLIPS, INC., by and | | |
| 19 | through their respective attorneys, hereby stipulate and agree as follows: | | |
| 20 | 1. Great Clips, Inc. was served with the Second Amended Complaint ("SAC") on | | |
| 21 22 | February 26, 2021. | | |
| 23 | 2. Great Clips, Inc. response to the SAC is currently due on March 19, 2012. | | |
| 24 | 3. Plaintiff and Great Clips, Inc. are reviewing documents and are involved in | | |
| 25 | discussions to determine whether or not an agreement can be reached as to whether or not Great | | |
| 26 | Clips, Inc. is a proper defendant in this litigation and need additional time to complete that process. | | |
| 27 | emps, mer is a proper detendant in this inigation | and need additional time to complete that process. | |
| 28 | | | |
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- 4. In order to avoid unnecessary time and expense in connection with motions to dismiss and other litigation matters pertaining to the SAC, Great Clips, Inc. and Plaintiff have agreed to extend the time by which Great Clips, Inc. shall be required to respond to the SAC by a period of 60 days.
- 5. Pursuant to this agreement between Great Clips, Inc. and Plaintiff, Great Clips, Inc. shall be required to file a response to the SAC on or before May 18, 2021.
- 6. Great Clips, Inc. and Plaintiff agree that good cause exists for the request for the extension of the deadline for a response to the SAC for the above-specified reasons.
- 7. Great Clips, Inc. and Plaintiff agree that the requested extension is warranted under the current circumstances and will not result in an undue or significant delay in the administration of this case. If Great Clips, Inc. remains in the case, the parties to this Stipulation acknowledge and agree that a short extension to the discovery and motion deadlines will be required. By entering into this Stipulation, Great Clips, Inc. does not waive its right to take and complete full discovery as to the issues raised in this matter, as permitted and allowed under the Federal Rules of Civil Procedure.

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Case 2:19-cv-01109-GMN-EJY Document 45 Filed 03/18/21 Page 3 of 3

| 1 | 8. Great Clips, Inc. and Plaintiff agree that an extension is in the best interests of all | |
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| 2 | | |
| 3 | parties involved in this litigation and the Cou | ırt. |
| | | |
| 4 | Dated this 18th day of March 2021. | Dated this 18th day of March 2021 |
| 5 | HKM Employment Attorneys LLP | Taft Stettinius and Hollister LLP |
| 6 | r v | |
| 7 | /s/ Jenny L. Foley | /s/ Jay W. Schlosser |
| 8 | Jenny L. Foley, Ph.D., Esq. Nevada Bar No. 9017 | Jay W. Schlosser, Esq. MN Bar No. 204353 |
| 9 | 1785 East Sahara Ave., Suite 300 | 2200 IDS Center |
| 10 | Las Vegas, Nevada 89104 | 80 South Eighth Street |
| 11 | Attorneys for Plaintiff | Minneapolis, MN 55402 Attorneys for Defendant Great Clips, Inc. |
| 12 | | |
| | ORDER | |
| 13 | | IT IS SO ORDERED |
| 14 | | $\langle 1 \rangle \rangle \langle 1 \rangle \rangle \langle 1 \rangle $ |
| 15 | Q ₀ | ELAYNAD. YQUCHAH |
| 16 | | UNITED STATES MAGISTRATE JUDGE |
| 17 | | Dated this 18th day of March, 2021. |
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